

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

**STIPULATION AND ORDER**  
**EXTENDING TIME TO RESPOND TO COMPLAINT**

Plaintiffs Compañía del Bajo Caroni (Caromin), C.A and V.M.C. Mining Company, C.A. and Defendants the Bolivarian Republic of Venezuela and Ministry of Basic Industries and Mines hereby stipulate and agree that the time for Defendants to serve and file a response to Plaintiffs' Complaint be extended to July 27, 2007. The extension to July 27, 2007 shall be the final extension that Defendants will request to respond to the Complaint.

This stipulation is submitted without prejudice to the Defendants' defenses under the Foreign Sovereign Immunities Act, 28 U.S.C. § 1602 *et seq.* and other applicable defenses, including lack of subject matter and personal jurisdiction and service of process defenses.

Respectfully submitted,

/s/ James Wilson Perkins (by permission)  
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Dated: July 19, 2007

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2007:

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United States District Judge